

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
STANLEY CHARLES AMEY SR. : **CASE NO. 1-20-03217-HWV**
aka STAN C. AMEY :
aka STANLEY CHARLES AMEY :
Debtor : **CHAPTER 13**

U.S. BANK TRUST NATIONAL :
ASSOCIATION, AS TRUSTEE OF CVI LCF :
MORTGAGE LOAN TRUST I :
Movant :

v. :

STANLEY CHARLES AMEY SR. :
aka STAN C. AMEY :
aka STANLEY CHARLES AMEY :
Respondent :

DEBTOR'S OBJECTION TO THE CERTIFICATE OF DEFAULT
FILED BY U.S. BANK NATIONAL ASSOCIATION

RE: REAL PROPERTY LOCATED AT 40 S. 3RD STREET, STEELTON, PA 17113

AND NOW, comes Debtor, Stanley Charles Amey, Sr., by and through his attorneys, Imblum Law Offices, P.C., and respectfully represents:

1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on or about November 2, 2020.
2. U.S. Bank National Association (hereinafter "U.S. Bank") filed a Certificate of Default on January 25, 2022.
3. According to the Notice of Default, Debtor was behind on payments through December in the amount of \$1,407.00.

4. Debtor filed his federal income tax return for 2021 on January 26, 2022. Same indicates that he will receive a refund of approximately \$5,000.00. Debtor expects to receive his refund within a month.

5. Debtor will use the refund to catch up on all post-petition arrears with U.S. Bank.

6. Debtor is in discussions to refinance his loan with U.S. Bank. Debtor hopes to complete the refinance as soon as possible.

7. Debtor will resume regular payments to U.S. Bank beginning February 2022.

WHEREFORE, Debtor respectfully requests that this Honorable Court refrain from granting U.S. Bank relief from the automatic stay in the above matter.

Respectfully submitted,



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Attorney for Debtor

DATED: 1/21/22

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S OBJECTION TO CERTIFICATE OF DEFAULT FILED BY U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE OF CVI LCF MORTGAGE LOAN TRUST I upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

JOSHUA I. GOLDMAN, ESQUIRE
PADGETT LAW GROUP
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

Carol V. Shay

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gary.imblum@imblumlaw.com
For Debtor

DATED: 1/27/2022